

# Exhibit 1

Court of Common Pleas of Philadelphia County Trial Division <b>Civil Cover Sheet</b>		For Prothonotary Use Only (Docket Number) <b>SEPTEMBER 2022</b> E-Filed Number: 2209034666 <b>001654</b>	
PLAINTIFF'S NAME ADAM HERNANDEZ		DEFENDANT'S NAME TARGET STORES INC, ALIAS: TARGET CORPORATION INC	
PLAINTIFF'S ADDRESS 1631 N. 3RD STREET PHILADELPHIA PA 19122		DEFENDANT'S ADDRESS 2701 CASTOR AVENUE PHILADELPHIA PA 19131	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 1	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
CASE TYPE AND CODE 2S - PREMISES LIABILITY, SLIP/FALL			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES    NO	
		FILED PRO PROTHY SEP 19 2022 S. RICE	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>ADAM HERNANDEZ</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY GARY P. HESLIN		ADDRESS HESLIN LAW FIRM 2834 COTTMAN AVENUE PHILADELPHIA PA 19149	
PHONE NUMBER (215) 332-0300	FAX NUMBER (215) 332-6224		
SUPREME COURT IDENTIFICATION NO. 27216		E-MAIL ADDRESS gary@heslinlawfirm.com	
SIGNATURE OF FILING ATTORNEY OR PARTY GARY HESLIN		DATE SUBMITTED Monday, September 19, 2022, 03:07 pm	

FINAL COPY (Approved by the Prothonotary Clerk)

**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
COURT OF COMMON PLEAS OF PHILADELPHIA**

Filed and Accepted by the  
Clerk of Judicial Records  
SEP 28 2022 3:19 pm



ADAM HERNANDEZ  
1631 N. 3RD Street  
Philadelphia PA 19122

CIVIL TRIAL DIVISION

vs.

TARGET STORES INC  
a/k/a TARGET CORPORATION INC.  
2701 Castor Avenue  
Philadelphia PA 19131

No.

MAJOR NON JURY

**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

*You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.*

Philadelphia Bar Association  
Lawyer Referral  
and Information Service  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197

10-284

**AVISO**

Lo han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

*Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

Asociacion De Licenciados  
De Filadelfia  
Servicio De Referencia E  
Informacion Legal  
One Reading Center  
Filadelfia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197

Case ID: 220901654

THE HESLIN LAW FIRM  
BY: GARY P. HESLIN, ESQUIRE  
I.D. #27216  
2834 Cottman Avenue  
Philadelphia, PA 19149  
(215)332-0300

Attorney for Plaintiff(s)

ADAM HERNANDEZ  
1631 N. 3<sup>RD</sup> Street  
Philadelphia PA 19122

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

vs.

CIVIL TRIAL DIVISION

TARGET STORES INC a/k/a TARGET  
CORPORATION INC.  
2701 Castor Avenue  
Philadelphia PA 19131

NO.

## COMPLAINT

1. Plaintiff is ADAM HERNANDEZ an adult individual who resides at 1631 N. 3<sup>RD</sup> Street

Philadelphia PA, 19122.

2. Defendant is, TARGET STORES INC ,a/k/a TARGET CORPORATION INC. a business, corporation, company and or an entity with offices for services of process located at 2701 Castor Avenue Philadelphia PA 19131 or in the alternative 1000 Nicollet Mall Minneapolis MN 55403 .

3. On August 8, 2021 at approximately 10:30 am Plaintiff was a business invitee and or

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customer or otherwise legally upon the property located at 2701 Castor Avenue in the City and County of Philadelphia in a retail store known as Target located at that address and or at that location ( hereinafter " Property " ). At all times relevant to this Complaint the Property was under the care, supervision and or control of the defendant.

4. On that date and time as aforesaid , the Plaintiff was caused to slip and or trip and fall due to an empty display or a empty metal skid or a empty metal pallet that was in an area and or extended into an area or aisle meant for customer and or business invitee foot traffic.

5 . On the above-mentioned date, the Defendant owned and or leased and or managed and or occupied the Property and the defendant had a duty to keep and maintain the aforesaid location and or Property in a reasonably safe condition.

6 . On the above-mentioned date, the Defendant permitted the aforesaid location and or Property to be in and remain in a hazardous condition to this Plaintiff and the public.

7. At the time aforesaid, the Defendant , individually and by and through their servants, workmen, agents and/or employees, was careless and negligent in that it knew or should have known through reasonable inspection that the aforesaid location and or Property was and had remained for an unreasonable length of time in an unsafe condition, thereby, creating and or constituting a hazard and an unreasonable risk of danger to the plaintiff and the public.

8. The aforesaid accident occurred and was caused totally and solely through the carelessness and negligence of the Defendant , in their ownership, operation, management and or control of the aforesaid location and or Property and was not due in any manner whatsoever to any act or failure to act on the part of the Plaintiff.

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9. By reason of the aforesaid carelessness and negligence of the Defendant, Plaintiff suffered injuries of the bones, muscles, tendons, ligaments, nerves and tissues of the head, body and limbs, which may be permanent in nature, some of which may have been aggravation of a pre-existing condition, all of which have in the past and may in the future cause Plaintiff great pain and suffering.

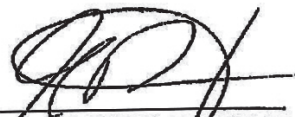
10. As a further result of this accident, plaintiff has been, or will be obliged to receive and undergo medical attention and care and to expend various sums of money for said care for an indefinite period of time into the future.

11. As a further result of Defendant's negligence, Plaintiff has and/or may suffer a loss of his earnings and/or earning capacity.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus interest and costs of suit.

Date: 9/19/22

Respectfully Submitted,

By :   
GARY P. HESLIN, ESQUIRE  
Attorney for Plaintiff

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**VERIFICATION**

I am taking Verification based upon information in the file which I believe to be true based upon statements of the client. However, the client is not available to sign this Verification and the Complaint is due; therefore, I take this Verification in the client's place and will substitute the Verification when he is located.

This statement is made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to unsworn falsification to authorities.

BY:

  
GARY P. HESLEN, ESQUIRE  
Attorney for Plaintiff

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